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MCB CAMP LEJEUNE
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LETTER AND U S NAVY RESPONSE TO THE NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES COMMENTS ON THE DRAFT EXPANDED
SITE INVESTIGATION REPORT MILITARY MUNITIONS RESPONSE PROGRAM SITE UXO-
02 UNNAMED EXPLOSIVE CONTAMINATED RANGE MCB CAMP
10/8/2012
CH2M HILL

Response to Comments

Draft ESI Report Military Munitions Response Program Site UXO-02 (ASR #2.201) – Unnamed Explosive Contaminated Range

Marine Corps Installations East –Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ), North Carolina

PREPARED FOR: Charity Rychak, MCIEAST/MCB CAMLEJ
Dave Cleland, NAVFAC Mid-Atlantic
Gena Townsend, EPA Region 4
Randy McElveen, NCDENR

PREPARED BY: CH2M HILL

DATE: October 8, 2012

Introduction

The purpose of this document is to address comments on the Draft ESI Report for Site UXO-02 (ASR #2.201) – Unnamed Explosive Contaminated Range. The North Carolina Department of Environment and Natural Resources (NCDENR) and United States Environmental Protection Agency provided the comments listed below. The responses to comments are provided in bold.

North Carolina Department of Environment and Natural Resources Comments (dated April 27, 2012)

General Comments

The NC Superfund Section concurs with the conclusions and recommendations of this Report. As stated in the Recommendations Section 7.2, “the remaining environmental impacts to be further assessed are associated with potential risks from exposure to waste and the VOC groundwater Plume (Site 69)” [and down-gradient VOC plume]. As documented in this Report Sediment samples at IR69-SD01 had detections of Vinyl Chloride (VC).

Therefore, the surface water and sediment from this tributary should continue to be sampled, analyzed, and evaluated for VOCs and SVOCs as part of the ongoing IR Site 69 Remedy. The IR69-SD01 sample location should be included in a surface/sediment evaluation as part of the Remedial Design confirmation sampling. The tributary at IR69-SD01 is located near the end of the VC plume at Site 69 and may continue to be impacted by site related VOCs since the source of VOC contamination is not being reduced or cut-off from further impacts to the down-gradient area of the site.

The fact that QC Seed items requires the EM61-MK2 coil to pass almost directly over a seed item or for that matter a real Unexploded Ordinance, gives great concern regarding the effectiveness of the Geophysical investigation process for high explosives sites. This lack of precision is extremely important at areas like Site UXO-19, Camp Devil Dog where large quantities of high explosives were discovered.

Since there were no high explosives detected or confirmed at Site UXO-02, the investigation results are sufficient for this area and make it clear that this area has no history of high explosives practice or usage.

Response

Comment noted. The Draft Site 69 ROD and Draft UXO-19 RI/FS are planned for submittal for NCDENR review in FY2013.

Dave Lilley Comments 9/13/2012 (NCDENR)

Human Health:

1. Appendix I: The date on the June 2010 Regional Screening Levels (RSLs) should be June 2011 to be consistent with the text in Section 5. It is recommended that the RSLs be updated in this report.

Response

The human health risk screening tables for groundwater have been updated with the June 2011 United States Environmental Protection Agency Regional Screening Level in accordance with this comment.

Ecological Health:

1. No Comments

**United States Environmental Protection Agency Comments
(dated May 31, 2012)**

General Comments

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated March 2012. EPA agrees with the recommendation of no further action for the portion of UXO-02 located outside of the Site 69 perimeter fence as it relates to the constituents associated with the Former Unnamed Explosive Range. EPA also understands that the remaining environmental impacts will be assessed under the OU14, Site 69 Feasibility Study.

Response

Comment noted.